



MEMO ENDORSED

**U.S. Department of Justice
United States Attorney
Southern District of New York**

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 5, 2007

USDC SDNY DOCUMENT
ELECTRONICALLY FILED
FILED #:
DATE FILED: 6/8/07

Via Facsimile

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Rm. 2270
New York, New York 10007

Re: United States v. Christian Rosario et al.
07 Cr. 308 (NRB)

Dear Judge Buchwald:

The Government respectfully submits this letter in connection with the above-referenced case to request that the Court (i) grant a two-week extension for the production of discovery, and (ii) reschedule the June 28, 2007 pre-trial conference in the case.

Due to the voluminous nature of the discovery as well as the ongoing investigation, the Government requests that its production be delayed for two weeks. Under such a timeline, discovery would be due June 22, 2007. I have spoken with Alan Haber, attorney for Manuel Soriano, and David Goldstein, attorney for Christian Rosario, and they have both consented to the request.

In addition, defense counsel have indicated that they would like to reschedule the June 28, 2007 pre-trial conference so that they may have additional time to review the discovery. I have spoken with your law clerk and she has indicated that Your Honor may have available 4 or 4:30 pm on July 9th or 4:30 p.m. on July 10th. Both of those dates work for the Government. If the Court is amenable, we would request that the pre-trial conference be scheduled on or close to the proposed date and times.

Finally, the Government respectfully requests, with defense counsel's consent, that the Court exclude time under the Speedy Trial Act from June 28, 2007 until the new pre-trial conference date, because the ends of justice served by excluding time under the Speedy Trial Act

So
Ordered

upon
consent from
Ds' counsel,
subsequent
conference
set for
July 10,
2007
4:30 PM
So Ordered

Hon. Naomi Reice Buchwald
June 5, 2007
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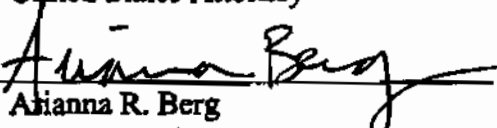
MEMO

outweigh the best interest of the public and the defendant in a speedy trial. See 18 U.S.C. § 3161(h)(8).

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:


Arianna R. Berg
Assistant United States Attorney
(212) 637-2551

cc: David Goldstein, Esq. (by fax)
Alan Haber, Esq. (By fax)

Government's production of
discovery due June 22, 2007.
Conference scheduled for June 28
is adjourned to July 10, 2007
at 4:30 PM.

SO ORDERED.


USDT
6-6-07